

Exhibit E

Dorothy L. Armstrong

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
DOROTHY L. ARMSTRONG**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)

: SS.:

COUNTY OF BRONX)

DOROTHY L. ARMSTRONG, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 278 Swinton Avenue, Bronx, New York 10465.

2. I am currently 68 years old, having been born on August 10, 1953.

3. I am the wife of John Armstrong, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from pancreatic cancer on November 8, 2011. It was medically determined that this illness was causally connected to his exposure to toxins resulting from the September 11, 2001, terrorist attacks.

5. John and I had a wonderful life together. He was a lot of fun to be with, and we enjoyed doing many things together. I met John when I was 29 years old. When John walked in

the door, I said, "That's my future. He's going to be my babies' daddy." John and I always had fun going on road trips. First, just the two of us, and later with our son, Keith. Even though I was the navigator, John never became upset when we got lost. They were all good times. Before moving to the Bronx, we lived on 94th Street and Third Avenue. Later, my husband decided to buy a house so there was more space for all of us, including my mother. I'm grateful John bought this beautiful house for me, but I've felt so lonely ever since he's been gone. So much so that my son recommends that I see a psychiatrist. As a DOT Supervisor, John loved his job, and everybody he worked with him loved him too. In fact, he was extremely outgoing and was very well-liked soon after meeting people. John was a great father and was in Keith's life constantly. He put Keith in all kinds of sports and spent a ton of time with him. The two of them were extremely close. Keith has my complexion, but he's the spitting image of his father. Every day when I see Keith, I'm reminded of John. I miss him everyday of my life. It's pretty lonely in this big house without my husband, just thinking about it makes me cry.

6. Since John worked as a supervisor for the DOT, he was tasked with working on the relief efforts after the attacks of September 11, 2001. He was working in the pit of Ground Zero all day for roughly three months. Part of John's responsibilities included putting the people on the boats and ferries to New Jersey because the PATH station at the World Trade Center was destroyed. Then, after helping people board or alight from the boats, he would work in the pit. John worked 12-hour shifts and sometimes would not return home until a week later. While he was working around the World Trade Center overnight, he would sleep in a nearby church where first responders were allowed to rest and could be fed. When John returned home, his work clothes were covered in toxic dust. As a result, I advised him to take them off and place them in a garbage bag for disposal. Ultimately, John was not required to work in the World

Trade Center area because of his status as a supervisor. However, he wanted to be there and frequently said that if his men were going to be there, he was going to be there too. When I asked him why he was so insistent about being there, John said, "Because I'm the boss and have a responsibility to the men that serve under me." Many of the men who worked in the same group that John did have passed away. Sadly, John was the first one. John often told me that the work he did at the World Trade Center was the worst thing he lived through.

7. For some time after 9/11, John had complained about pain in his stomach and back. Unfortunately, things quickly became more serious. While attending a funeral for my friend's mother, John went to the bathroom in the church and lost control over his bowel movements. While that incident happened in April, John was still in denial about his health. But I knew it was only the beginning of his problems. After seeing a doctor and running some tests, it was determined that John had pancreatic cancer. John had a Whipple procedure to remove a portion of the pancreas. He was then in the hospital fairly consistently every two months. And that's when he was diagnosed. I couldn't understand why they kept doing this. After my husband was diagnosed, he lost a lot of weight and looked very frail. I felt so sad because the doctors told me about John's diagnosis on my birthday, which was August 10th, and they only gave him another three months to live. John tried to reassure me and told me that he would be around a long time. Sadly, he died two days short of the three months the doctors had given him.

8. Before John passed away, my son worked in the private sector and took leave under the Family Medical Leave Act. He took the additional time to help John in any way he could. He would carry John down the stairs on his back in the morning, so John wouldn't get bed sores, and he'd carry him back up the stairs at night. John needed so much extra care because he was so weak. He wasn't even able to feed himself anymore. After John was


diagnosed, he tried to do chemotherapy. It was too strong for him and made him extremely weak. Keith and I would go with him to the chemotherapy center for his treatment. One time, John fell while we were on the way there, and the treatment had to be delayed one week so he could recuperate from the fall. After the fall, John's oncologist felt that it didn't make sense to continue with the treatments.

9. While John was battling cancer, everyone was as helpful as they could possibly be. My son's fiancé, Adriana, took care of John while Keith worked. Together, we were able to make sure my husband didn't miss any doctor appointments. Unfortunately, John had another fall about one month after he was diagnosed while in the bathroom. It was impossible for my son's fiancé to pick him up after he fell. After that, Adriana didn't want to be responsible if something else happened to John, and that was when Keith had to engage his time off under the Family Medical Leave Act. Unfortunately, I wasn't able to do the same because I was with the Teamsters at the time and would have needed a leave of absence.

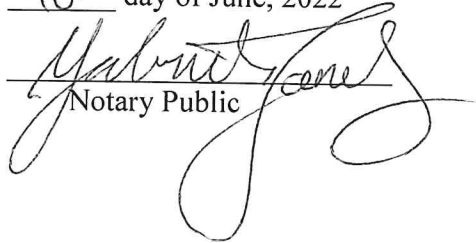
10. The cancer wore John out so much that by the time he passed away he weighed only 85 pounds. John's coworkers knew that he had very little time left. He was so well-loved that his coworkers decided to have a party for him at the same place where they had his retirement party. They used it as an excuse for everyone to say their goodbyes. John was in really rough shape. While I wanted to surprise him with all the guests, I had to tell him because he wouldn't go otherwise. When he arrived, John stood up and he said, "Everybody, I love you. And this is goodbye."

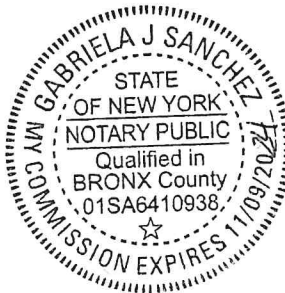
11. The time that John had cancer went by so fast. After he got sick, it seemed like he was gone the next day. That's how fast it happened. He didn't deserve to suffer the way he did in the end. One of the last meals John asked me to make was a shrimp scampi. After I prepared it,

he could barely take a bite. Keith tried to feed him, but it was almost impossible. My husband was so loved by friends and family. There were about 25 people visiting the house on the day that John took his last breath. Everybody was here, even his best friend from when he was five years old sat by his bed until he was gone. It was difficult for me to be there; I had to go outside and pray for the Lord to take him and not let him suffer anymore. When my son and I were beside him before he passed away, he wouldn't look at us. He spoke to us with closed eyes, as if he didn't want to see our pain. Looking back, when hospice came to the house that morning, they told me John would be gone by six o'clock. He died exactly at six o'clock.


DOROTHY L. ARMSTRONG

Sworn to before me this
10th day of June, 2022


Notary Public



Keith Lee Armstrong

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

AFFIDAVIT OF
KEITH LEE ARMSTRONG

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF BRONX)

KEITH LEE ARMSTRONG, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3971 Gouverneur Avenue, Apt. 5B, Bronx, New York 10463.

2. I am currently 38 years old, having been born on August 1, 1983.

3. I am the son of John Armstrong, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from pancreatic cancer on November 8, 2011. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to toxins resulting from the September 11, 2001 terrorist attacks.

5. My father and I were very close. Growing up, he kept me active. He would take me to baseball games, especially to as many Yankees games as he could, and other sporting

events. He had me join youth sports leagues, and whenever he was not working, he would attend my games and cheer me on – baseball in the spring, and basketball in the fall. He made sure that I had everything I needed growing up. On his payday every two weeks, he would take the family out to a steak dinner. Each year after summer camp but before going back to school, we would take a road trip to Virginia and spend time on the beach together. He was an amazing father and was always there for me. He made it his mission to make sure that I had the opportunity to experience many different things and get the most out of life.

6. My father worked for the Department of Transportation. They were part of the group removing debris from Ground Zero in the aftermath of the 9/11 attacks. He and some of his colleagues spent 4 to 6 weeks, 12 hours a day, moving chunks of concrete and whatever else needed to be moved. Following the attacks, my dad was part of the group of people that helped get the city back to where it needed to be.

7. My father first started having health problems related to pancreatic cancer in July or August of 2011. I was living at home with my parents and fiancé at the time. My dad was never a complainer. If he was having issues, he tried to deal with them himself. He didn't want his problems to become someone else's. But I started noticing some changes in him around this time. He started to complain about pain in his back and stomach. These pains were coming on quickly and were consistent. He went to the doctor and after running tests, it was determined that he had pancreatic cancer. By the time he was diagnosed, the cancer had already become quite advanced. Treatment options were limited, but he did try chemotherapy. Because of the chemotherapy treatment, he would be exhausted after coming home and would often just go to bed and sleep. After a while, his energy depleted, he just spent most of his time in bed. He barely ate, despite my mother making all of his favorites, and had very little energy for the

things he previously enjoyed.

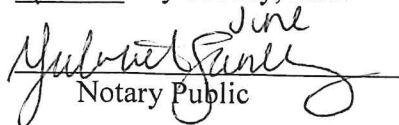
8. My dad's diagnosis devastated me. I remember coming home from work and speaking to him about it. I had expected him to be around for at least 10 to 15 more years since his mother had lived a long life. Realizing that wasn't going to be the case shook me to my core. I was young at the time, about 25 years old, enjoying life and spending time with my friends. I believe that if he had been around as I grew older, we would have shared many meaningful conversations together. There would have been opportunities to ask him big questions about life and his personal experiences. I feel I missed these opportunities because his decline from the cancer was so rapid.

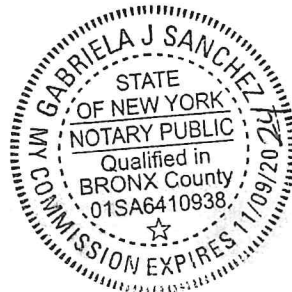
9. My family and I experienced financial stresses as a result of my father's illness and passing. We were all living together, and my mother had been used to my father handling house-related bills. When he passed, these bills became her responsibility. I tried to help, but I was still young and not making a great salary. This financial burden took its toll and led to contention between my mother and me. But I did understand the enormous stress she was under. I lost so much due to my dad's illness and passing. I lost a mentor, a father, and a friend. I think of him every day and sometimes feel his presence with us.

10. Even after all these years, it's still difficult to talk about the terrorist attacks. That ruthless cruelty took away so much from so many people, including me personally. I will never forget the impact it had on my life.


KEITH LEE ARMSTRONG

Sworn to before me this
10th day of ~~May~~ ^{June}, 2022


Notary Public



Joanne T. Alcabes

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X
JOANNE T. ALCABES, et al,

AFFIDAVIT OF
JOANNE T. ALCABES

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

JOANNE T. ALCABES, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 51 Halley Drive, Blue Point, New York 11772-6515.

2. I am currently 72 years old, having been born on September 21, 1949.

3. I am the sister of Charles Richard Gunzelman, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. Charles passed away from lung cancer on May 31, 2015, at the age of 59. It was medically determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Although Charles was seven years my junior, we were always very close. We had a really nice, loving, and kind relationship. We grew up in an apartment in Brooklyn. While my

mother would go shopping, we would watch TV together. I smile when I remember the times that Charles would be eating Oreos while we watched TV. He somehow always managed to find the stash of cookies before I did. Our family eventually moved to Bethpage, and I would watch Charles after school when our parents were out of the house. After I got married, my husband taught Charles all about mechanics. I used to bring them coffee as they worked in the garage. My brother and I saw a lot of each other while we lived in Bethpage. But, after his retirement in 2005, Charles moved upstate to McDonough and it was more difficult to meet quite as often. It was a treat visiting Charles upstate because there were so many fun activities to do. Charles loved spending time with my children. They always had such fun going snowmobiling in the winter. I'm glad that Charles was present with the kids as much as possible. Charles never had children of his own, and he was extremely good to my four sons. Remarkably, I now have eleven grandchildren. My brother used to take the kids to Six Flags and ride on the rollercoasters with them. He took them on other outings as well. He was a special guy who died way too young. After Charles became ill, we spoke even more frequently, and I would go up to visit him on weekends. During his battle with cancer, I tried to convince him to move back to Long Island, but he preferred to remain upstate, where it was quiet.

6. As an NYPD Sergeant, Charles worked on the rescue and recovery effort following the September 11, 2001 attacks. He didn't like to talk much about his experience. He did tell me, however, that the things he saw at Ground Zero were quite chilling and terrible. After he completed the 9/11 recovery work at the World Trade Center site, Charles retired on May 1, 2002. Following his retirement, Charles worked as a mechanic in Brightwaters while living at my mother's home in Bethpage. He eventually stopped working and moved upstate.

7. Sometime in 2013, I received a call from Charles telling me that he had been having problems with congestion and sinus infections. After treating with a number of doctors, Charles called to tell me that he saw a doctor in Cooperstown who informed him he had Stage IV cancer and was in the hospital. Alarmed by the news, my husband and I drove up to visit him in the hospital the next morning. It was upsetting to me that my brother was so sick. On one of my visits to the hospital, the doctor pulled me aside and told me that I had to pull it together for Charles because he was going to need me. And that's what I did. After he was released from the hospital, Charles was prescribed a regimen of chemotherapy treatments, which impacted his quality of life.

8. As a mechanic, Charles used to take care of all the work on his truck by himself. Suddenly, it became difficult for him to take care of basic maintenance, let alone complicated repairs. Since his treatments were in Cooperstown, it was impossible for him to drive back and forth in his condition. Even though I was working full-time, I made time to visit my brother every weekend and help him attend his chemotherapy appointments. Usually, I would leave home on Friday and return Sunday evening. I would sometimes use a vacation day to spend a longer weekend with my brother. Thankfully, after some time, Charles had a good friend who would also drive him to his appointments. The last year of my brother's life was particularly hard because he needed a wheelchair. At 58 years old, he didn't want to be in a wheelchair. Hoping his condition would improve, Charles replaced his old truck with a brand new one. Sadly, he never had the chance to enjoy it much. When he passed away, the odometer read less than 700 miles. Essentially, having once been a very independent person, Charles could do little else than sit on his porch, assisted by his oxygen tank to help him breathe. Since Charles had friends in the

area, we paid them to keep an eye on him during the week and assist him by making sure his oxygen was connected as he moved around the house.

9. On May 18, 2015, I went to visit Charles for his birthday. Considering the circumstances, he was in good spirits. We even played some cards. Nearly five hours into my drive back home, I received a call from Charles's friend telling me that they were at the hospital. I was very puzzled since Charles had seemed fine just a few hours before. Nevertheless, I turned around and started the long drive back upstate to the hospital. When I arrived, Charles told the nurses that he was not ready to implement the DNR order. Watching him suffer day after day was extremely difficult. The doctor showed me the imaging of his lungs, which showed how the far the cancer had spread. As Charles continued to suffer, he was unable to speak. Eventually, with nobody else there, Charles wrote me a note that simply said, "Please let me go." I rushed the note to the doctor but was told that they couldn't accept the note alone as authority. His morphine drip was reduced, and after a number of witnesses entered the room, he again said, "Let me go." I invited a few of Charles's friends to say their final goodbyes. Within ten minutes of being removed from life support, my brother died. Charles was a good guy, and he died way too young.

10. Throughout Charles's battle with cancer, I was extremely saddened knowing how much he suffered. I spoke to my brother on the phone every single day for at least an hour. I was powerless to help make him better, which was draining and painful. The cancer was all over his body. He couldn't even walk. I visited him as often as I could to keep him company, but his cancer was already quite far along. At first, I would make the trip once every three weeks. Then, it became every two weeks, until I was able to go more frequently and stay for longer periods. This was particularly stressful since I was also working a full-time job as a school principal's

secretary and missed a lot of work to look after Charles. Many times, I would leave work right at three o'clock and immediately start the trip upstate. In addition to the long drives upstate and missed work, I was also anxious that I wasn't available enough for my husband and children. While they understood why, my family really took a backseat after Charles was diagnosed. Of course, they were supportive, but I still felt a little guilty and wished I was able to be in two places at one time.

11. With Charles alone and far away, I worried about him quite a bit. I was concerned as to whether he would have enough food or other basic needs in the house, I made him get an alert button in case he needed to call an ambulance at a moment's notice. Toward the end of his life, Charles was unable to walk, and I needed to make sure that he had enough of an oxygen supply. Despite my suggestion that he move into our guest bedroom, Charles insisted he was more comfortable upstate, where it was quiet and peaceful. I'll never forget how heartbreaking it was to have to talk with Charles about his wishes after death, including burial and funeral arrangements. Those were extremely difficult conversations. But, somehow, we got through it and visited some of the places in person. Charles requested that he not be buried at Calvary Cemetery in Queens, so I purchased a plot for him at a graveyard upstate.

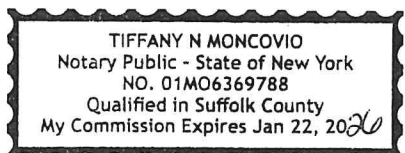
12. In the course of caring for Charles, there were a number of out-of-pocket expenses. Certainly, there were costs associated with traveling upstate, as well as the costs of making sure my brother had sufficient provisions at home. When Charles needed a wheelchair or a walker, I would make sure he had very good ones. In addition, I personally compensated his friends for their assistance in driving Charles to his chemotherapy appointments. The expenses were never on my mind, I simply wanted to make sure that my brother received the proper care.

13. My brother has been gone for seven years. I still miss him every single day. I'm hurt that Charles missed out on spending time with my children and grandchildren at all of the family functions. All around my home are reminders of my brother. I think of him when I pass by family photographs and plaques that honored his service. Having met other families in the 9/11 community, my heart goes out to all those who tragically lost someone from the terrorist attacks and from 9/11-related illnesses.

Joanne T. Alcabes
JOANNE T. ALCABES

Sworn to before me this
4 day of ~~May~~ ^{June} 2022

Tiffany N. Moncovio
Notary Public



Patricia Mae Budd-Stewart

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X
JOANNE T. ALCABES, et al,

AFFIDAVIT OF
PATRICIA MAE BUDD-STEWART

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF MARYLAND)
: SS.:
COUNTY OF PRINCE GEORGE'S)

PATRICIA MAE BUDD-STEWART, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 9219 Goldenrod Lane, Upper Marlboro, Maryland 20772
2. I am currently 78 years old, having been born on November 29, 1943.
3. I am the mother of Keith Owen Henry, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. Keith passed away from multiple myeloma on November 13, 2015, at the age of 55. It was medically determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My son and I were very close from his childhood until later in life. Shortly after high school, he joined the Army. After that, he moved to Brooklyn, New York. I would not see him as often as I would have liked because he was often working. But we would talk on the phone all the time and try to spend time together on holidays, especially Thanksgiving.

6. In the aftermath of the September 11, 2001 attacks, my son Keith assisted with the cleanup efforts on the ground. He would complain about the fumes and dust he was breathing. He would tell me on the phone about his superiors having better quality masks than him. I would advise him to put on two masks instead of one. I even suggested that he buy masks from the drugstore himself. He also mentioned several times that they would find bodies while cleaning up.

7. On several occasions, while they were still cleaning up, he felt sick and went to the hospital. But he would dismiss my worries and tell me that it was nothing. Keith stayed on the grounds until the clean-up was completed.

8. After he had completed his job, he initially would complain of headaches. He even called me once to tell me that he had fallen while crossing the street in New York. I was worried and recommended he go to the hospital. Unfortunately, he was not treated very well at the hospital and was hesitant to go again. He later also complained about breathing problems.

9. At that point, I wanted him to move to Maryland where his sister and I were based. He kept on going to work even though he was suffering. It took us months to convince him to move to Maryland. His illness was getting worse. He was not eating; he was constantly vomiting. We finally were able to get him to the hospital where I used to work as a medical secretary.

10. There are no words to describe how worried I was. Mothers think they can fix everything even when their children are grown. My child was hurting and was extremely ill. I could not do anything to alleviate his pain, to find a solution. I was feeling frustrated and helpless.


11. When he moved to Maryland, it was the beginning of a new phase: endless doctors' appointment, back-to-back admissions in the hospital, sometimes for two or three weeks on end. He would also get tested time and time again. We would even take him to other hospitals to see other doctors. This was very grueling physically and mentally on him and on his loved ones. At the time, I felt that I did not have the luxury to pause and think about it. All I was focused on was to do whatever it took to help my son and to mainly monitor his pain. I had to shut down my emotions and well-being.

12. When he started chemotherapy in Washington DC, I would accompany him and anxiously wait for him to finish his treatment. He eventually had to undergo kidney dialysis as well. This was three times a week. I would often accompany him to that treatment too.

13. Before all of this happened, my son was very healthy and happy. It was very hard to see him suffer and not being able to work. More often than not, he would be unable to sleep at night, and I would wake up and see him through my open bedroom door, sitting on the couch, in pain.

14. I felt like I was witnessing his slow death and there was nothing I could do. Beyond the physical pain, I also saw my son suffer mentally. For instance, it was very degrading for him to allow me to bathe him, a grown man being helped by his mother. He would always say that it was supposed to be the opposite. I knew it hurt him, but I was trying my best to be a good mother and a good supporter. It was hard on everyone.

15. My son Keith was such a funny man, constantly cracking jokes around people. After the attacks, after all the horrible things he saw and all the toxic air he was exposed to, he disappeared little by little and turned into a shadow of himself. I do believe that whatever happened at Ground Zero was what killed my son.


PATRICIA MAE BUDD-STEWART

Sworn to before me this
27 day of May, 2022


Notary Public

Antwannette C Welch
NOTARY PUBLIC
Prince George's County, Maryland
My Commission Expires 9/16/2025

MARYLAND NOTARY ACKNOWLEDGEMENT
(OATH OR AFFIRMATION SHORT FORM)

State of Maryland
County of Prince Georges (or City of Baltimore), to wit:

Sworn to and subscribed before me by Patricia Stewart
[name of person(s) swearing] this 27 day of May, 2022

[Notary Seal]
Public]

A. Welch
[Signature of Notary]

Antwannette C. Welch
NOTARY PUBLIC
Prince George's County, Maryland
My Commission Expires 9/16/2025

Antwannette C. Welch
[Printed Name of Notary Public]
Notary Public
My Commission Expires: 9/16/2025

Charlene Marie Kyles

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X

JOANNE T. ALCABES, et al,

**AFFIDAVIT OF
CHARLENE MARIE KYLES**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF MARYLAND)

: SS.:

COUNTY OF ST. MARY'S)

CHARLENE MARIE KYLES, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 22680 Cedar Lane Court, Apt. 2315, Leonardtown, Maryland 20650.

2. I am currently 59 years old, having been born on January 12, 1963.

3. I am the sister of Keith Owen Henry, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. Keith passed away from multiple myeloma on November 13, 2015, at the age of 55. It was medically determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My brother and I were always very close. Before he got ill, I often visited him in Brooklyn. I very much enjoyed my trips there and loved hanging out with him. We liked to go to

museums and even went to the zoo once, just for fun. We also enjoyed New York's nightlife with friends. But mostly, I would just be happy spending quality time with him and having him close to me.

6. At the time of the September 11, 2001 terrorist attacks, Keith was working for a construction company. In the aftermath of the attacks, he was part of the team who was pulling the bodies out of the rubble. I remember he used to say that he had never experienced anything like that in his life. He couldn't breathe from all the debris and smoke. The smell of dead bodies also particularly bothered him, and he would repeatedly tell me that it was the worst experience of his life. During that period, we would be on the phone, and he would describe it as "the distinct smell of death." It was very hard for me to hear him say these words. I almost felt his pain. He would cough and repeat "the smell, the horrible smell." Knowing Keith was going through that every day was painful for me. I can't even image what it was actually like for him to see the horrible things he saw.

7. A few years later, Keith called me one day and told me that he had to go on dialysis. At that point, he didn't know exactly what was wrong with his kidneys, but the whole ordeal was very hard on him. I could hear it in his voice. It was obvious that he wasn't feeling well, and instinctively I knew that I had to see and be with him.

8. I was living with my mother in Maryland at the time, and Keith was living in New York. Quickly, his health deteriorated to a point where he had to be taken care of and have someone with him at all times. When I went to New York to pick Keith up to bring him to Maryland, I actually walked passed him. He had lost so much weight that he was unrecognizable. It was shocking. Prior to his illness, Keith was very active and in good health. He suddenly looked so fragile and sick. It shook me to my core.

9. After that, I completely changed my life in order to be close to him. I practically gave up my apartment and stayed with my mother so I could be near Keith. I would personally take him to his dialysis treatment three days a week before we eventually arranged for medical transportation.

10. Eventually, Keith went back to New York, but that was short lived because his condition only worsened. He began coughing up blood and experiencing debilitating pain. I went to pick Keith up in New York for a second and final time.

11. To help alleviate his pain, I often gave Keith massages. He joked that I should become a masseuse. I would playfully reply that I wouldn't do it for anyone else but him. Eventually, even massages weren't helping. He went for a biopsy and was diagnosed with myeloma. On the day he was officially diagnosed, I remember being very angry because I could not get to the hospital to see him before his biopsy. When I got there, I was right outside the door, and I could hear him screaming during the procedure. I wanted to cry.

12. Keith's illness engendered many other complications. He became so weak at some point that he broke his hip and had to undergo surgery. One nightmare on top of the other.

13. My brother was a fighter and fought as hard as he could. He tried to stay alive for the sake of his family, but the pain was simply too much for him. He tried different creams and ointments, but nothing helped. He was simply desperate to find any way to survive. Seeing my brother suffer that way utterly ripped my heart apart. I basically watched him die. The day he died, I was the only family member present in the room when the medical team were trying to resuscitate him. I can still in my mind see this lady on top of him performing CPR. That image is forever embedded in my mind. It was extremely painful to helplessly stand there and witness it all.

14. My brother loved his family so much. His face would light up whenever my son Jeffrey would visit him. He and Keith were very close. Being a big kid himself, Keith was particularly fond of the younger family members. I remember when we brought my granddaughter to visit him, he kept on repeating, "I've got to get better. I want to be there for her." That's the type of man he was. Losing him was not only devastating for me personally, but it was a great loss for our entire family.

15. Taking care of my brother did impact me financially. I had to pay out of pocket for gas, groceries and some over-the-counter medications. My priority back then was my brother's wellbeing.

16. For a long time during his illness and after his death, I was extremely angry. My brother was healthy before he was exposed to all the chemicals and toxins in the aftermath of 9/11. I also felt helpless. I kept reliving watching his health deteriorate and seeing how much pain he was in. At one point, I remember wanting to give him one of my kidneys. Unfortunately, that wasn't possible. I feel on many occasions that Keith tried to express that he was going to die, but he would try to make light of it. I just kept praying a miracle would happen.

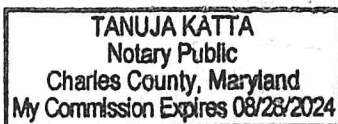
17. When Keith died, I was able to put up a plaque on the wall of my church's building. It is right above where I plan to be buried when my time comes. Even though my brother was not a parishioner of the church, it's my way of knowing that he will always be looking over me. This is my sole consolation.


CHARLENE MARIE KYLES

Sworn to before me this
16 day of May, 2022



Notary Public



Tara J. Thomas

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X

JOANNE T. ALCABES, et al,

**AFFIDAVIT OF
TARA J. THOMAS**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF MARYLAND)

: SS.:

COUNTY OF CHARLES)

TARA J. THOMAS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 5137 Royal Birkdale Avenue, Waldorf, Maryland 20602.

2. I am currently 50 years old, having been born on October 11, 1971.

3. I am the sister of Keith Owen Henry, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. Keith passed away from multiple myeloma on November 13, 2015, at the age of 55. It was medically determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Keith was my older brother. We lived together while growing up until he left home to join the military. We had a typical big brother and little sister relationship. As I got

older, we would talk about everything in our lives. We talked about relationships, kids, and life in general. Because Keith had moved to New York after leaving the military, and since I was living in Maryland, we spoke on the phone regularly to keep in touch. He was a good big brother and a wonderful uncle to my three kids. My kids loved him, too. He was the type of person who would give you the shirt off his back.

6. Keith worked as a heavy crane operator and assisted with the cleanup efforts in the aftermath of the 9/11 attacks. He would tell me stories of his experiences going through the debris and finding bodies. It was a difficult experience for him.

7. Although Keith wasn't a complainer, he started complaining about being in a lot of pain and how the pain pills he was taking were not helping. He even tried alternative pain management strategies in order to avoid taking additional medication, but these did not help either. One day, around 2015, he slipped off his bed and broke his hip. It was through this injury that his cancer was discovered. In fact, it was the cancer that made it so easy for him to break his hip and have to undergo surgery.

8. My brother kept some of his symptoms from my mother and me. It was only through the intervention of one of his friends in New York that we learned the extent of his illness. This friend found my home phone number and called to explain how Keith's health had deteriorated and how he was in serious need of help. My mom had actually answered the call, as she was living with me at the time. My mom, my sister, and I drove to New York to see Keith that very next day.

9. Keith was in very bad shape when we arrived. His body was noticeably full of fluid, and his eyeballs were bulging out of his head because of the fluid buildup. We had to carry him down the stairs to our car and even had to put a diaper on him. That's how bad his condition

was. We gathered some of his belongings and drove him back to Maryland with us. We took him to a hospital in Maryland near our home. He was immediately admitted and put in the Intensive Care Unit. By this point, he had kidney failure and had suffered a stroke. As a result, he immediately began dialysis treatment. He was in the hospital for a while and then later stayed at my house for about 6 to 9 months.


10. As a result of these health issues, Keith had to see many specialists and continue with his dialysis treatment. He not only had to see a kidney specialist, but because of his high blood pressure and the stroke he suffered, his vision had become very bad. He needed to see eye specialists, in addition to the others, to treat that issue. I had never known Keith to have health issues before these things occurred.

11. Keith and I were able to spend time together while he lived at my house during his treatments. My mother and I helped him with his care and took him to and from his dialysis appointments.

12. One day, my mom called and asked if I could pick Keith up from his dialysis treatment. I said I would because I did not have work until later that day. When we got home, it became increasingly clear to me that Keith was in very bad shape. I was worried and did not want to leave him alone, so I had my two oldest children come over to stay with him until my mom arrived. My daughter said that she had tried to get Keith to eat but he would not.

13. Just about the time my mother arrived home, Keith went into cardiac arrest. She called the EMTs, and they were able to briefly revive him before transporting him to the hospital. He flatlined again at the hospital, but they were unable to revive him. I was with him the day he passed, as were my mother and kids. It is still very difficult for me to look back on that day. It still physically upsets me to recall.

14. We did everything we could for Keith in his final months, and we did it with an open heart. He needed us, and that wasn't easy for him. But we loved him and had to do what we could to make him comfortable. The immense loss we feel since he passed away is indescribable. I know I will continue to miss him every day. He was a wonderful person.


TARA J. THOMAS

Sworn to before me this
14th day of May, 2022


Notary Public

NATALIE R. SIMPSON
NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires 07/19/2023

John F. Hough

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

AFFIDAVIT OF
JOHN F. HOUGH

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

JOHN F. HOUGH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 88 San Juan Drive, Hauppauge, New York 11788.

2. I am currently 54 years old, having been born on February 13, 1968.

3. I am the son of John Joseph Hough, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from esophageal cancer on December 8, 2013. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My dad and I were very close. He guided me throughout my career, which began as a lineman and later as an officer in the police department. He arranged many of the activities

that we did together, including family gatherings and recreational boating. My childhood was very pleasant, and my father would encourage me as I participated in sports, including football and baseball. Both my mom and dad were present for all of my school extracurriculars. My dad would also organize at least one family vacation each year, which made for a happy childhood.

6. My father worked as an Inspector for the Suffolk County Police Department. After the 9/11 attacks, my dad and his team were flown by helicopter to the city to assist in any way they could. I'm proud to say that my father served as part of the Command Center at Ground Zero in a supervisory capacity. He remained at Ground Zero for several days.

7. Before I learned about my father's cancer diagnosis, I noticed that he was coughing heavily. After observing the cough on several occasions, I was becoming quite alarmed. Eventually, after some time, my father came to my house and told me that he had been diagnosed with esophageal cancer. I was shocked. After sharing his diagnosis with me, his health declined rapidly. He spent most of the day in my living room, resting and watching TV. During this time, I tried to make sure he was as comfortable as possible. I helped take him to many medical appointments, including several radiation treatments he had at the Memorial Sloan Kettering Cancer Center in Commack.

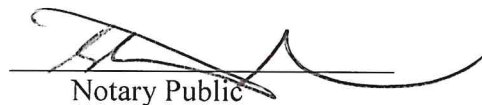
8. My father's excruciating illness had a profound impact on my life on an emotional level. My father's cancer was probably the hardest phase of my life. It was awful to watch his suffering and see him in pain as his health declined. The months and years immediately following my father's death were undeniably the most stressful times of my life. In particular, it is difficult to see the effect his passing had on my family. It is very clear that they are not as close as they used to be. The reality is that my father was the glue that kept our family organized and together. Now, that is noticeably absent. The more that I come to learn about my

father after he passed away, the more I feel that he was a good person; one who really worked hard to serve others. In addition to me and my immediate family, my father touched many lives. He is missed by hundreds of people still to this day.

9. Since his passing, several ceremonies have been held in his honor. His name is also mentioned twice a year at our church during mass. And that's just a small sample of how my father's passing impacted our community and the world around us.


JOHN F. ROUGH

Sworn to before me this
06th day of May, 2022


Notary Public

STEVEN GIBISER Notary Public - State of New York No. 01GI6398494 Qualified In Suffolk County My Comm. Expires Sep. 30, 2023
